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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91194418
Party	Defendant Doerfler, Austin, Anthony
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Submission	Answer
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Date	05/17/2010
Attachments	Answer to Notice of Opposition.pdf (4 pages)(396805 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Trademark Application of:
Austin Anthony Doerfler

Application No.: 77/836,807

Filed: September 29, 2009

Mark: **SIM·BLISS·ITY \SIM-'BLI-SE-TE\ N. 1: (THE QUALITY OF
NATURAL JOY) 2: COMPLETE HAPPINESS THROUGH LACK
OF COMPLICATION. SEE PURITY**

Bliss World LLC,)	
Opposer,)	
)	
v.)	Opposition Nos. 91194418
)	
Austin Anthony Doerfler,)	
Applicant.)	

ANSWER TO NOTICE OF OPPOSITION

Austin Anthony Doerfler ("Applicant"), by and through his undersigned counsel, hereby denies that Opposer will be damaged by the mark shown in Application Serial No. 77/836,807 ("Mark") and answers the Notice of Opposition by Bliss World LLC ("Opposer") as follows:

1. Applicant is without sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 1, and therefore denies same.
2. Applicant is without sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 2, and therefore denies same.
3. Applicant denies that the word "bliss" is highlighted in its mark. Applicant is without sufficient knowledge or information to either admit or deny the remainder of the allegations contained in Paragraph 3, and therefore denies same.

4. Applicant admits that the subject application for registration of the mark was filed on September 29, 2009 and attests to use of the mark in connection with the goods designated therein at least as early as January 11, 2009.
5. Applicant denies the allegations contained in Paragraph 5.
6. Applicant denies the allegations contained in Paragraph 6.
7. Applicant denies the allegations contained in Paragraph 7.
8. Applicant denies the allegations contained in Paragraph 8.
9. Applicant denies the allegations contained in Paragraph 9.
10. Applicant denies the allegations contained in Paragraph 10.
11. Applicant denies the allegations contained in Paragraph 11.

AFFIRMATIVE DEFENSE ONE

There is no likelihood of confusion between the parties' respective marks as applied to their respective goods.

AFFIRMATIVE DEFENSE TWO

Upon information and belief, Opposer's claims for relief are barred in whole or in part under the doctrines of laches, acquiescence and estoppel.

WHEREFORE, Applicant, having fully and completely answered the Notice of Opposition and having asserted certain affirmative defenses, prays that the Board dismiss the opposition with prejudice.

Dated: May 17, 2010

Respectfully submitted,

/s/Allison R. Imber


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Certificate of Service

The undersigned hereby certifies that on May 17, 2010, a copy of the foregoing was served via first class mail, postage prepaid, on the following:

David Ehrlich
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Elizabeth Toney